

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,                     )  
   )  
                  Plaintiff,                         )  
   )  
vs.   ) Case No.: 4:13-cr-298 JCH  
   )  
ELIZABETH EARNEST,                             )  
   )  
                  Defendant.                        )

**DEFENDANT’S SECOND MOTION TO CONTINUE SENTENCING**

COMES NOW Defendant, Elizabeth Earnest, by and through counsel, and hereby moves this Court to continue the sentencing presently scheduled for January 9, 2014 for a period of fourteen (14) days. In support of this motion, Defendant states as follows:

1. Defendant’s sentencing is presently scheduled for January 9, 2014.
2. Within the last thirty days, counsel has completed sentencing memoranda in United States v. Royce Spann, 3:13-cr-30131WDS (S.D. IL 2013) , United States v. David Ray, 3:13-cr-141 DRH (S.D. IL 2013), and United States v. Craig Molitor, 4:12-cr-423 AGF (E.D. MO 2013), in addition to counsel’s ordinary schedule of jail visits, court appearances, client meetings, and discovery review. These matters, among others, have impeded counsel’s ability to effectively prepare for Defendant Earnest’s January 9th sentencing.
3. For this reason, Defendant files the instant motion for a brief two week continuance.
4. Defendant has discussed this matter with assistant United States attorney John Bodenhausen. Mr. Bodenhausen does no object to Defendant’s request.

WHEREFORE, Defendant respectfully requests this Honorable Court continue the sentencing presently scheduled for January 9, 2014 for a period of fourteen (14) days.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Adam D. Fein  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 8, 2014 the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. John Bodenhausen, assistant United States attorney.